UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

| | |
|---|---|
| IN RE "A MILLION LITTLE PIECES" LITIGATION | No. 06-md-1771<br>Hon. Richard J. Holwell |

**AFFIDAVIT OF JOHN H. ALEXANDER IN SUPPORT OF JOINT PETITION FOR ATTORNEYS' FEES AND REIMBURSEMENT OF COSTS FILED BY JOHN H. ALEXANDER & ASSOCIATES, LLC**

STATE OF ILLINOIS)
ss.:
COUNTY OF COOK)

JOHN H. ALEXANDER, being first duly sworn, deposes and says:

1. I am a partner of the firm of JOHN H. ALEXANDER & ASSOCIATES, LLC. I am submitting this affidavit in support of my firm's application for an award of attorneys' fees in connection with services rendered in the above-entitled action ("The Action") and the reimbursement of expenses incurred by my firm in the course of this litigation.

2. My firm acted as one of plaintiff's counsel in this class action. The tasks undertaken by my firm can be summarized as follows:

Participated in the litigation of this matter, including but not limited to the filing of pleadings, participation in settlement negotiations, travel to Kansas City, Missouri whereby I appeared and argued before the judicial panel for Multi-District Litigation on behalf of the plaintiffs, and together with all other acts on behalf of the plaintiffs.

Dockets.Justia.c

3. The chart attached hereto as Exhibit A is a detailed summary indicating the amount of time spent by the partners of my firm who were involved in this litigation, and the lodestar calculation based upon my firm's current billing rates for such personnel in the final year of employment by my firm. As reflected therein, my firm expended a total of 98.50 hours on this litigation from the inception of the case to the present, with a total lodestar amount of $41,862.50.[1] Time expended in preparing this application for fees and reimbursement of expenses has not been included in this request.

4. The hourly rates for the partners in my firm included in Exhibit "A" are the same as the regular current rates charged for their services in non-contingent matters and/or which have been accepted and approved in other class action matters in this District.

5. The chart attached hereto as Exhibit "B" is my firm's itemization of un-reimbursed expenses incurred in the total amount of $602.92 in connection with the prosecution of this litigation.

6. The expenses incurred in this Action are reflected on the books and records of my firm. These books and records are prepared from expense vouchers, check records and other source materials and are an accurate record of the expenses incurred in connection with the prosecution of the litigation.

7. With respect to the standing of counsel in this case, attached hereto as Exhibit "C" is a brief biography of my firm and attorneys in my firm who were principally involved in this litigation.

---

[1] The schedule was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm, which are available for inspection upon request of the Court.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 27th day of September, 2007.

JOHN H. ALEXANDER

SWORN TO BEFORE ME
this 27th day of September 2007.

NOTARY PUBLIC

"OFFICIAL SEAL"
GLORIA E. LOPEZ
Notary Public, State of Illinois
My Commission Expires August 14, 2008

**EXHIBIT "A"**

**IN RE "*A MILLION LITTLE PIECES*" LITIGATION 06-MD-1771**

**BILLING**

**FIRM NAME: JOHN H. ALEXANDER & ASSOCIATES, LLC**

**REPORTING PERIOD: January 1, 2006 through September 25, 2007**

| ATTORNEY NAME | TOTAL HOURS | HOURLY RATE | TOTAL LODESTAR |
|---|---|---|---|
| JOHN H. ALEXANDER | 98.50 | $425 | $41,862.50 |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| **TOTAL** | 98.50 | $425 | $41,862.50 |

**EXHIBIT "B"**

**IN RE "*A MILLION LITTLE PIECES*" LITIGATION 06-MD-1771**

**EXPENSES**

**FIRM NAME: JOHN H. ALEXANDER & ASSOCIATES, LLC**

**REPORTING PERIOD: January 1, 2006 through September 25, 2007**

| TYPE OF EXPENSE | CUMULATIVE TOTAL |
|---|---|
| Computerized Legal Research (Westlaw, Lexis, Dialog, etc.) | $ |
| Court Cost & Filing Fees | $ |
| Court Reporters & Transcripts | $ |
| Photocopying | $ |
| Postage, Messenger & Express Mail, FedEx | $ |
| Professional Services (Experts, Investigators, etc.) | $ |
| Telephone & Fax | $ |
| Travel, Hotels, Meals | $602.92 |
| Miscellaneous | $ |
| **TOTAL** | $602.92 |

**EXHIBIT "C"**
**Professional Profile**

## John H. Alexander

With more than 33 years of extensive litigation experience, John H. Alexander has always provided legal representation to individuals and small businesses claiming damages. Many of the cases he has successfully litigated and/or settled were well publicized in both the print media and the TV media. Among the more notable are the following:

- Class Action against Nicor involving mercury contamination;
- Class Actions against Commonwealth Edison Company for damages to individuals and to consumers;
- Class Actions against Citibank and other bank institutions for consumer fraud of their customers and credit card holders;
- Class action against State Farm Insurance Companies for violations of consumer rights;
- Class actions against various other corporations, i.e., Arista Records, Ford Motor Company, McDonald's Corporation, etc. for violations of consumer rights;
- Class actions against various municipal entities regarding the refunding of improperly or illegally collected taxes;
- A case involving one the first nationally successful wrongful suits against an HMO;
- Cases against People's Gas Company for serious injuries due to fires and explosions;
- Numerous other successful suits against nationally known companies for various types of injuries and damages to individuals and to businesses.

BAR ADMISSION

- Illinois 1974
- US District Court for the Northern District of Illinois 1974
- US Court of Appeals, Seventh Circuit 1974

EDUCATION

- Juris Doctor, DePaul University College of Law, 1973
- B.A., University of Illinois B.A., 1970

PROFESSIONAL ASSOCIATIONS

- Illinois Trial Lawyers Association
- Illinois State Bar Association
- Chicago Bar Association
- National Lawyers Guild
- Hellenic Bar Association